



**United States Environmental Protection Agency  
Region V  
POLLUTION REPORT**

**Date:** Tuesday, November 25, 2008

**From:** James Augustyn, OSC

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**Subject:** Initial  
DLH Plating Site  
2801 Grand Avenue, Cleveland, OH  
Latitude: 41.4847  
Longitude: -81.6281

<b>POLREP No.:</b>	1	<b>Site #:</b>	B5NQ
<b>Reporting Period:</b>	11/5/2008-11/25/2008	<b>D.O. #:</b>	31
<b>Start Date:</b>	11/11/2008	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	11/11/2008	<b>Response Type:</b>	Time-Critical
<b>Completion Date:</b>		<b>NPL Status:</b>	Non NPL
<b>CERCLIS ID #:</b>	OHN 000510286	<b>Incident Category:</b>	Removal Action
<b>RCRIS ID #:</b>		<b>Contract #</b>	68-S5-03-01

**Site Description**

The Site is located in a residential and light-industrial area. The Site is immediately surrounded by residential properties (less than 50 feet away) on the northeastern border and other industrial properties border the rest of the Site. The Site includes an office building, and one large interconnected building for plating operations. The total approximate size of the building is 50,000 square feet.

Plating and manufacturing activities have been occurring at the Site since the 1880s. The facility has had numerous owners, but electroplating has been the primary industry on the Site for the majority of its operating history.

The DLH Plating Company is a "job-shop" plating operation that plates steel with zinc and cadmium. At one time, the facility operated as many as seven plating and coating lines. Prior to February 2007, DLH operated an on-site waste water treatment system for hexavalent chrome reduction, cyanide oxidation, and metals flocculation. Hazardous wastes generated at the facility have included F006 waste water treatment sludge along with F007, F008, D003, D006, and D007 spent plating solutions and sludges. DLH Plating Company leases the property from the Grand Avenue Realty Company.

See Site Profile on the web site for more detailed information.

### **Current Activities**

On November 5, 2008, U.S. EPA and its Emergency Rapid Response Services (ERRS) and Superfund Technical Assessment and Response Team (START) contractors met to perform a walk through of the Site with Ohio EPA, NEORSD, DLH Plating, and Grand Avenue Realty. On November 11, 2008, U.S. EPA mobilized its ERRS and START contractors to initiate removal actions at the Site.

Activities performed by START from November 12, 2008, to November 25, 2008, included: documentation of Site activities and conditions; establishing a Site Emergency Contingency Plan; providing comments on the ERRS Site Health and Safety Plan; and performing air monitoring during Site activities.

On November 12, 2008, ERRS completed mobilizing personnel and equipment to the Site. Began setting up personnel trailers; contracting portable toilet services and security services; establishing a Site Health and Safety Plan; establishing Site control zones; and setting up an equipment storage and decontamination area.

On November 13, 2008, ERRS completed mobilizing a generator for electricity to the Site trailers; and calculating waste volume estimates of tank material. The City of Cleveland Division of Fire visited the Site and informed DLH Plating personnel that no hot work (torch welding or cutting) is permitted inside the building under any circumstances.

On November 14, 2008, ERRS completed sampling 59 tanks inside and outside the building. START spoke to the owner of DLH Plating and requested that all DLH personnel sign in and out upon entering and exiting the Site each day. START provided ERRS with comments on the Site Health and Safety Plan.

On November 15, 2008, ERRS completed hazard characterization testing on 44 samples. START installed hydrogen cyanide (HCN) sensors in the U.S. EPA-owned Area RAE and Multi RAE multi-gas air monitors.

On November 17, 2008, ERRS covered the open tanks outside of the building to prevent liquid material from overflowing onto the ground. ERRS completed hazard characterization testing on 21 samples. U.S. EPA contacted the City of Cleveland Police Department to inform them of Site activities and request that a patrol vehicle drive by the Site during off hours and weekends.

On November 18, 2008, ERRS collected 51 tank/vat samples and submitted 11 waste characterization samples for disposal analyses. ERRS has completed sampling all of the tanks except tanks T122-T125 in the pump house. See DLH Plating Site layout figure in the documents section of this web site for location.

On November 19, 2008, ERRS completed sampling the totes in the building (45 totes). While collecting the tote samples, ERRS performed pH testing on the samples to

classify like materials for bulk hazard characterization. ERRS sampled the water in the flooded elevator shaft, performed hazard characterization testing on 29 samples, and moved outside tanks T114 and T115 into the building for use in the collection of standing floor water. ERRS and START performed a walk through with the owner of DLH to inform him of the upcoming small container inventory and request that he remove materials (motor oil, propane cylinders, oxygen cylinders, acetylene cylinders, etc.) from the Site that he does not want disposed of by U.S. EPA. 10,700 gallons of frac tank liquids [Hazardous Waste Liquid (Cadmium, Chromium) D006, D007] were removed from the Site by tanker truck and transported to Vickery Environmental, Inc. in Vickery, Ohio for disposal. Waste Management mobilized a 40 cubic yard roll-off box to the Site for the disposal of empty containers and non-hazardous waste.

On November 20, 2008, ERRS collected tank samples from the pump house and submitted liquid samples to the laboratory for waste characterization analysis. 5,500 gallons of frac tank liquids [Hazardous Waste Liquid (Cadmium, Chromium) D006, D007] were removed from the Site by tanker truck and transported to Vickery for disposal.

On November 21, 2008, ERRS continued to gather, segregate and count small containers from throughout the facility. The ERRS chemist began segregating small containers in the former Site laboratory.

On November 24, 2008, two tanker trucks were mobilized to the site to remove liquids from the frac tank and outdoor tanks T-007 and T-121 [Hazardous Waste Liquid (Cadmium, Chromium) D006, D007]. ERRS continued to gather and segregate small containers throughout the facility. Empty small containers were cut up or crushed and placed in a roll-off box for disposal.

On November 25, 2008, three tanker trucks were mobilized to the site to remove liquids from outdoor tanks T-116, T-117, T-118, T-119, T-120, and T-121 [Hazardous Waste Liquid (Cadmium, Chromium) D006, D007]. ERRS continued to gather and segregate small containers throughout the facility. Empty small containers were cut up or crushed and placed in a roll-off box for disposal. ERRS began logging the labeling information from drums located in Room B.

All liquid wastes stored in tanks outside the facility were removed from Site before they were adversely impacted by severe cold weather.

### **Planned Removal Actions**

ERRS will continue to perform: general site clean-up; staging drums and small containers; sampling drums and small containers; performing hazard characterization testing on all samples; consolidating waste material; submitting waste characterization samples to a laboratory for disposal analyses; and coordinating transportation and disposal of waste material.

START will continue to document Site activities and conditions and perform air monitoring.

### Next Steps

ERRS will begin sampling drums and small containers, continue hazard characterization testing on all samples, submit waste characterization samples to a laboratory for disposal analyses, and transport and dispose of waste liquids from inside the facility.

### Key Issues

Removal activities at the site will be suspended from November 26, 2008, through November 30, 2008, for the Thanksgiving Holiday.

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$200,000.00	\$96,196.00	\$103,804.00	51.90%
RST/START	\$25,000.00	\$8,650.00	\$16,350.00	65.40%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$225,000.00</b>	<b>\$104,846.00</b>	<b>\$120,154.00</b>	<b>53.40%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

### Disposition of Wastes

Total to Date:

41,510 gallons of Hazardous Waste Liquids D006, D007 (Chromium, Cadmium) has been transported to Vickery for disposal

Waste Stream	Quantity	Manifest #	Disposal Facility
RQ, NA3082, Hazardous Waste, Liquid, N.O.S., (Chromium, Cadmium), 0, NA3082, III, D006, D007	5,400 gallons	001988725	Vickery Environmental, Inc., Vickery, Ohio
RQ, NA3082, Hazardous Waste, Liquid, N.O.S., (Chromium, Cadmium), 0, NA3082, III, D006, D007	5,300 gallons	001988726	Vickery Environmental, Inc., Vickery, Ohio
RQ, NA3082, Hazardous Waste, Liquid,	5,500	001988727	Vickery Environmental,

N.O.S., (Chromium, Cadmium), 0, NA3082, III, D006, D007	gallons		Inc., Vickery, Ohio
RQ, NA3082, Hazardous Waste, Liquid, N.O.S., (Chromium, Cadmium), 0, NA3082, III, D006, D007	5,600 gallons	001988728	Vickery Environmental, Inc., Vickery, Ohio
RQ, NA3082, Hazardous Waste, Liquid, N.O.S., (Chromium, Cadmium), 0, NA3082, III, D006, D007	5,300 gallons	001988729	Vickery Environmental, Inc., Vickery, Ohio
RQ, NA3082, Hazardous Waste, Liquid, N.O.S., (Chromium, Cadmium), 0, NA3082, III, D006, D007	4,850 gallons	001988730	Vickery Environmental, Inc., Vickery, Ohio
RQ, NA3082, Hazardous Waste, Liquid, N.O.S., (Chromium, Cadmium), 0, NA3082, III, D006, D007	4,610 gallons	001988731	Vickery Environmental, Inc., Vickery, Ohio
RQ, NA3082, Hazardous Waste, Liquid, N.O.S., (Chromium, Cadmium), 0, NA3082, III, D006, D007	4,950 gallons	001988732	Vickery Environmental, Inc., Vickery, Ohio

[www.epaossc.net/DLHPlating](http://www.epaossc.net/DLHPlating)